201-14371

NCIC HPV
Sent by: Mary-Beth Weaver

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To: NCIC HPV, moran.matthew@epa.gov
cc:
cc:
Subject: Environmental Defense comments on Petroleum Oxidates and derivatives

Richard_Denison@environmentaldefense.org on 03/26/2003 10:03:33 AM

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Subject: Environmental Defense comments on Petroleum Oxidates and derivatives

(Submitted via Internet 3/26/03 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, and lucierg@msn.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Petroleum Oxidates and derivatives.

This test plan was prepared by Lubrizol Corporation and is comprised of 8 CAS numbers representing a very large but undefined list of individual chemicals. The CAS numbers are 64742-98-9, 64743-00-6, 64743-01-7, 68425-34-3,
68602-85-7, 68603-10-1, 68603-11-2 and 68603-12-3.

The Petroleum oxidates are used to prevent corrosion and in other applications for lubricity and water repellency. No information was provided by the sponsor on potential exposures in the environment, home or workplace. Although these kinds of data are not explicitly required by the HPV program, they do allow reviewers of the test plans to evaluate the adequacy of the test plans with more confidence.

The sponsor proposes to group the 8 CAS numbers into 2 subcategories. However, the justification for category formation is far from convincing; we disagree with the sponsor's proposal and we also disagree with some of its proposals regarding the need for additional studies to fulfill the requirements of the HPV program. Specific comments are as follows:

1. Petroleum distillates do belong as a separate subcategory as proposed by the sponsor because of vast differences in molecular weights and chemical properties compared to the other 7 CAS numbers. However, we disagree with the proposal to lump the other 7 into a second category: no useful information was provided regarding the chemical structures of individual constituents of these mixtures or their toxic properties that would justify such a grouping. It is not enough to say that they are acids and/or their chain lengths are within a range of 33-43 carbons. The criteria for category formation require far more justification than is presented in this test plan. Nevertheless, we would agree that the 4 oxidized and esterified hydrocarbon waxes likely belong in a category. The oxidized Petrolatum waxes likely belong in another category and the unesterified but oxidized hydrocarbon waxes likely belong in yet another category. Therefore, we recommend 4 separate categories for the CAS numbers comprising this test plan. We would, however, be willing to review a revised test plan that provtdes reasonable justification for a different set of categories.

2. We aqree that data on physical and chemical properties are adequate to fulfill HPV requirements. However, the data provided on partition

coefficients argues against the sponsor's proposal for only 2 subcategories.

3. The sponsor states that photodegradation, fugacity and biodegradation data will be calculated for representative constituents of the mixtures covered by this test plan. Which constituents will be tested? We cannot evaluate the adequacy of this test plan if such specifics are not provided.

4. The read-across approach for ecotoxicity testing of the CAS numbers covering the proposed subcategory 2 is not justified. Until reasonable justification is provided, we cannot concur that data are needed for only one member of the proposed subcategory.

5. The sponsor proposes that acute toxicity tests be conducted on petroleum distillates. We disagree with the need for these studies; sufficient high-dose data will be generated from the range finding component of the repeat dose studies used for dose selection purposes.

6. There are no repeat dose, reproductive or developmental toxicity data available for members of this proposed category and the sponsor asserts that a proposed study on petroleum distillates will fulfill requirements of the HPV program. This proposal flies in the face of the sponsor's proposals that this test plan is comprised of 2 subcategories and has no scientific foundation. While we agree that combined repeat dose/reproductive/developmental toxicity studies are appropriate for this test plan, we recommend that at least 4 such studies be conducted, for the reasons outlined in comment 1 of this review.

Thank you for this opportunity to comment.

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